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United States District Court  
Southern District Of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

FEB 11 2020

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

SYLVIA GARCES VALDEZ  
FRANCES SALINAS DE LEON

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§

CRIMINAL NO. M-19-1502-S2

**SEALED SECOND SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

From at least June 4, 2018, and continuing through at least December 6, 2018, in the Southern District of Texas, the defendant,

**SYLVIA GARCES VALDEZ**

did corruptly give, offer, or agree to give a thing of value to any person intending to influence and reward an agent of the City of La Joya, a local government that received benefits in excess of \$10,000 pursuant to a Federal program involving a grant, contract, subsidy, loan guarantee, and other forms of Federal assistance in 2018, in connection with any business, transaction, or series of transactions of such State government and agency involving something of value of \$5,000 or more; namely, Valdez gave, offered, and agreed to give cash to Frances Salinas De Leon intending to influence and reward influence in granting a public relations contract to the Defendant.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

**COUNT TWO**

From at least June 4, 2018 and continuing through at least December 6, 2018, in the Southern District of Texas, the defendants,

**SYLVIA GARCES VALDEZ  
FRANCES SALINAS DE LEON**

did intentionally and knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises in execution and for the purpose of executing said scheme and artifice transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any writings, signals, pictures or sounds, namely the following email:

<b><u>DATE</u></b>	<b><u>WRITING</u></b>	<b><u>FROM</u></b>	<b><u>TO</u></b>
June 13, 2018	Email	chemgarces2187@icloud.com	francesanasalinas@gmail.com

In violation of Title 18, United States Code, Sections 1343, 1346, and 1349.

**COUNT THREE**

From in or about January 2016, and continuing through at least July 20, 2016, in the Southern District of Texas, the defendant,

did intentionally and knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises in execution and for the purpose of executing said scheme and artifice transmitted and caused to be transmitted

by means of wire communication in interstate and foreign commerce, any writings, signals, pictures or sounds, namely the following email:

<u>DATE</u>	<u>WRITING</u>	<u>FROM</u>	<u>TO</u>
February 9, 2016	Email	robertojackson43@gmail.com	cityoflajoya@aol.com

In violation of Title 18, United States Code, Sections 1343, 1346, and 1349.

**NOTICE OF CRIMINAL FORFEITURE**  
**18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)**

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), the United States gives notice to the defendants,

**SYLVIA GARCES VALDEZ**  
**FRANCES SALINAS DE LEON**

that upon conviction for the offenses in this Indictment, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, is subject to forfeiture.

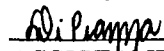
**Property Subject to Forfeiture**

The property subject to forfeiture as to Counts One and Two is approximately \$22,000; the property subject to forfeiture as to Count Three is approximately \$235,000. In the event that a condition listed in Title 21, United States Code, Section 853 exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ASSISTANT UNITED STATES ATTORNEY